

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
JAY SRINIVASAN,	)	
	)	
Plaintiff	)	
	)	
v.	)	Civil Action No.: 05-10900-GAO
	)	
SIEMENS BUSINESS SERVICES, INC.,	)	
	)	
Defendant	)	
_____	)	

**JOINT MOTION TO ENLARGE DISCOVERY DEADLINE AND  
TO CONTINUE STATUS CONFERENCE**

The parties hereby jointly move to enlarge the discovery deadline and to continue the status conference currently scheduled for June 28, 2006, on the following grounds:

1. Fact discovery is currently scheduled to be completed by June 23, 2006.
2. The plaintiff intends to take the depositions of several additional witnesses.

Scheduling those depositions has proven to be difficult because most of the deponents are non-parties and are located outside of Massachusetts.

3. The parties are proceeding diligently with discovery and need the additional time in order to complete the fact discovery phase of this case.

4. This is the second discovery extension being sought by the parties.

5. The parties respectfully request that the court extend the fact discovery phase of the case to August 23, 2006.

6. Since the status conference was scheduled to be held after discovery has been completed, the parties further request that the status conference currently scheduled for June 28,

2006, be continued to a date after August 23, 2006, so that fact discovery will have been completed by the time the status conference is held.

WHEREFORE, the parties jointly move that the court enter an order enlarging the discovery deadline in this action to August 23, 2006, and continuing the status conference to a date after August 23, 2006.

Plaintiff  
JAY SRINIVASAN  
By his attorney,

Defendant  
SIEMENS BUSINESS SERVICES, INC.  
By its attorneys,

*/s/ Robert H. Flynn*

*/s/ Jean L. Schmidt*

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